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Lester Snow, Director
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Subject: Integrated Regional Water Management Plan grants program

Dear Lester:

I would like to offer the following comments on behalf of my clients, the County of Plumas and the Plumas County Flood Control and Water Conservation District on the Integrated Regional Water Resources Management Program (IRWMP). These comments are directed in light of the passage of Propositions 84 and 1E last year which authorized funding for developing IRWMP plans and implementation projects. Additionally, my clients as applicants for project funding under Proposition 50, wish to address specific topics which are relative to the existing IRWMP funding process.

The Integrated Regional Water Management Plan (IRWMP) program can be an effective process for developing solutions to local and regional water resources challenges in a cost effective manner. Additionally, IRWMPs provide a venue for local and regional interests to develop cooperative plans and solutions which are supportive of the State's own Water Plan (Bulletin 160). Indeed, much of the actual on the ground

implementation for Bulletin 160-05 will be shouldered by local and regional entities, carrying out their IRWMP. Your continued leadership in the Bulletin 160-05 process, in recognizing and supporting such local and regional implementation of state resource management strategies, will be critical to this effort.

The IRWMP offers a logical, open and public forum, for dealing with the complex challenges of managing water resources and other related natural resources throughout this state. IRWMPs are a necessary next step to the integration of water resources efficiency throughout the hydrologic cycle. The presence of the IRWMP implements that efficiency in a manner that incorporates institutional integration as well. IRWMPs offer the opportunity to manage water resources in an fashion which provides for the most efficient use of limited fiscal resources.

The IRWMP Program, coupled with funding through the grant program, is a valuable tool for local agencies and others to complete planning and carry out implementation at a local and regionally effective scale. This work should also provide key and timely information for the Department of Water Resources when it carries out the regular updating of it's State Water Plan, thereby creating a larger public benefit.

It is because of those reasons, as well as others, that Plumas County and the Plumas County Flood Control and Water Conservation District coordinated the development and adoption of the Upper Feather River IRWMP in June of 2005. Working with core partners (the Plumas National Forest and the Sierra Valley Groundwater Management District), and taking advantage of preexisting institutional linkages with local, state, and federal agencies and non-governmental organizations with operations and responsibilities in the region, the Upper Feather River IRWMP has achieved broad stakeholder support from local, regional, and statewide interests.

The Upper Feather River Watershed IRWMP provides for the integration of seven existing plans which were developed by the statutory planning entities in the watershed. While each of those plans individually dealt with subject matter and policy for the individual agency they did not singly, encompass the entire watershed.

Having established our interest, participation (as an unsuccessful applicant for project funds in last year's process) and support of the IRWMP Program, we nonetheless believe that there are specific matters related to the administration of the Program that can be improved upon. It is our sincere hope that the State will evaluate the IRWMP Program and consider suggestions for improvement in its administration, application and implementation.

SCALE

The process should formally recognize - in the Guidelines - the need for IRWMPs on a smaller scale than the State's ten generally recognized hydrologic regions.

The hydrologic regions identified and utilized in the State Water Plan, the Regional Boards and as applied as regional components in the IRWMP Program, should not be considered mandatory minimum sized units for IRWMP Program purposes. It is reasonable, and logical, that due to landscape features, regulatory influences, watershed boundaries, land management patterns, water delivery systems, water rights, and other factors, that there will be more than ten regions throughout the State. Each of those functionally scaled regional planning processes can be coordinated with the other IRWMP processes where appropriate.

It may be possible to use the regional structure anticipated in the Bulletin 160-08 process to serve as a clearing house or informal coordination sounding board for developing IRWMPs within the regions.

LOCAL AND STATE PRIORITIES

The State Department of Water Resources (DWR) is the manager of the State Water Project. Additionally, it is the agency of the state charged with regular updating of the State Water Plan. The DWR should identify, as a clear State priority, the ongoing planning and implementation of programs and projects which are beneficial to the State Water Project. Further it should be recognized that the local and regional implementation of water management strategies which were adopted in the State Water Plan are a "State Priority" and should not be second guessed by evaluators of project implementation applications as to their utility. The airing and discussion of the Bulletin 160-05 Water Management Strategies was relentless and extensive. The role of the IRWMP application evaluators should rather be in the context of are the State's identified locally applicable priorities considered and implemented in the Integrated Regional Water Management Plan and attendant implementation projects.

That metric could be easily measured and should be scored appropriately.

DISADVANTAGED COMMUNITIES

The evaluation scoring for applications for both planning and implementation grants funds should include a category for the inclusion and targeting of disadvantaged communities.

This scoring should reflect the importance of resolving sometimes expensive and time consuming conflicts in these areas which are for the most part fiscally the least able to

deal with them. To quote your own pledge in the Bulletin 160 process, *"No Region should be left behind."* In following up on that pledge DWR should assure that it actively seeks out, encourages and provides scoring recognition for disadvantaged communities throughout the IRWMP grant process.

APPLICATION INFORMATION

There should be adjustments made in the Program's administration to decrease the size and costs of applications to applicants.

There must be recognition and accommodation by the IRWMP agency administrators that local agency resources, even when combined with other partner entities, are limited. It is a hardship to expend significant local fiscal resources, staff and consultant time in the development of applications and supporting documents which can reach well over 1,500 pages. Those costs are incurred in some cases in advance of institutional coordination, project design, environmental analysis and project entitlements. Especially in the implementation grants, previous planning which went into the IRWMP development and adoption should be recognized by the grants program evaluating agencies. This burden can actually serve as a disincentive for disadvantaged communities which already suffer from bare bones budgets and lack of discretionary funds. The IRWMP application process, while encouraging competition for scarce public funds must not be designed to award the rich and punish the poor.

We urge the managing agencies to work with applicants and their partner entities in developing a more streamlined and focused process for dealing with applications for implementation grants. This effort should be carried out with a specific objective of holding down direct and indirect costs to applicants in the application process. Where possible disadvantaged communities should be provided with weighted scoring recognition of their severely limited institutional capacity.

TRUE INTEGRATION

The IRWMP process should produce plans and projects that reflect true integration. That integration should, through an open, inclusive and ongoing public process demonstrate these four key elements of integration:

- 1. Institutional Integration.** Integrated resources planning and implementation actions, when carried out through partnerships and active coordination by local, state and federal agencies, will assist in breaking down institutional boundaries and regulatory barriers. An truly integrated resources management approach will

provide a framework and a forum for partnership agencies to work jointly towards common resource objectives. This integration will be manifest in ongoing planning, management and regulatory venues through the implementation of agreed upon plans, projects and management actions. Cooperative and coordinated planning will replace single purpose “silo” plans as the metric of successful institutional integration.

2. **Resource Integration.** A multiple resources approach would include an integration of the management objectives and protocols for surface water, groundwater, land use practices and ecosystem restoration and management. The treatment of these resources and practices applied within a watershed wide approach would avoid single species or a single resource focus and instead work towards multiple resource and species objectives throughout the watershed. The integration of resources through planning efforts, management initiatives and implementation measures, will solidify institutional agreement and relationships through on-the-ground actions within common resource objectives. Clear evidence of multiple resource management and planning rather than single resource management and planning will be the metric of successful resource integration.
3. **Watershed Integration.** Watershed boundaries represents the logical planning geographic focus to achieve the most effective integration venue of resources, governments and interest groups. By working on a commonly supported set of management goals for the watershed and not each resource, or by focusing on each agency’s boundaries and authority individually, a true integrated resource program will be efficiently implemented. This could provide fiscal efficiencies and funding opportunities which would not exist otherwise. A watershed boundary based IRWMP - rather than one based on political boundaries - will serve as the metric of successful watershed based integration.
4. **Analysis and Data Integration.** Implementation projects and management actions would work within common data protocols, data collection and utilization. Further, they would result in a uniform process for managers in reviewing, testing and adapting to data which is collected within common parameters. Distribution and availability of data will be in a form acceptable to, and endorsed by, the watershed partners and cooperating entities so as to most efficiently utilize information. The use of common and compatible data gathering, analysis and reporting systems by IRWMP partners will be the metric of success in analysis and data integration.

COLLABORATION

Collaboration not confrontation and litigation

In addition to the preceding key elements of integration the evaluation and ranking of applications in an Integrated Regional Water Management Program should exercise active diligence to assure that collaboration - that is the integration of nontraditional interests - as well as traditional resource interests is captured and rewarded in the Program. This should not be seen as an added "cost" by applicants but rather as an affirmative duty so as to provide functional collaboration and evidence of that collaboration in the record.

While not all conflict can be resolved in any program or process, generally collaboration reduces local conflict, brings additional of expertise to the process, and enables genuine integration in planning and project development. Indeed, for the IRWMP to be sustainable as a statewide program and as a local tool, collaboration will prove to be the critical element for successful IRWMPs. Functional collaboration of different interests goals and strategies into joint planning and projects is a key element to achieve the greatest cost benefits and simultaneously address multiple goals with single projects.

The presence of vibrant discussion aired publicly as well as ongoing community and stakeholder participation, with an affirmative public outreach effort will serve as the metric for success in collaboration.

PROGRAM CLARITY AND INCLUSION

Plan, Adopt, Implement.

If the IRWMP is to ever achieve its promise as a way to plan for, and implement water resources strategies in a cost effective and timely manner, then the IRWMP planning work carried out - once completed - should be accepted by the State for implementation. The awarding of project funds under Proposition 84 and 1E should recognize existing IRWMP Plans that have already been adopted in compliance with earlier Proposition 50 Guidelines and avoid additional costs to those areas which have diligently prepared Plans already.

The present IRWMP Program provides for funding of planning activities and implementation actions and projects. Funding for the former provides for standards to assure that the IRWMP is adequate and was developed with public and stakeholder involvement in a truly collaborative manner. Implementation of completed IRWMPs - especially those that have identified water resource management strategies and projects - should only be evaluated on the specific attributes of the strategies and projects as to

their consistency with the IRWMP. To wit, projects found consistent with an adequate IRWMP (which was prepared consistent with the four key elements of integration and collaboration) are ready for funding and implementation, not reevaluation.

ENVIRONMENTAL STEWARDSHIP

Integrated Regional Water Resources Management Plans and Projects should demonstrate the inclusion of a systemic environmental stewardship program as one metric of having a functional, inclusive, transparent and open public collaborative process. Single purpose projects while technically feasible, must demonstrate that they are part of a larger multipurpose strategy, as clearly demonstrated in the IRWMP Plan, that includes a systemic environmental stewardship approach.

Environmental Stewardship, systemic to the Plan and program should be rewarded as part of scoring Implementation proposals for meeting multiple objectives. Single purpose infrastructure projects should not be favored by the scoring criteria. Recognition of ongoing, systemic environmental stewardship within an application proposal is the metric that must be captured in scoring.

SCORING SHOULD REFLECT VALUES

The state's funding mechanism needs reworking to achieve the potential for the IRWMP to become a valuable and value added tool in improving resources planning.

The current IRWMP Planning guidelines and scoring for the IRWMP Implementation grants simply do not require, or appropriately reward collaboration, the four key elements of integration, or systemic environmental stewardship. Nor do they provide equitable scoring for local implementation statewide priorities identified in the State's Water Plan, nor encourage new innovative projects that were developed to meet IRWMP objectives in a collaborative and integrated fashion. Finally, the scoring utterly failed to provide incentives or even recognition of disadvantaged communities. Unfortunately, numerous regions were left behind. We know that was not your intention in this process and that it can be corrected.

INTERIM IMPLEMENTATION

There should be continued implementation (project) funding out of remaining IRWMP funds. That is, those funds which were available prior to the passage of Proposition 84 and 1E and had not been awarded in the first round of implementation projects. We urge that the DWR and the SWRCB jointly extend funding to those previously submitted projects, which have already been evaluated and scored, but went unfunded in the past round of grant awards.

The standards for funding under Proposition 84, 1E and Proposition 50, due to the language in the Bonds, are different. We do not believe that those who have prepared IRWMPs Plans in the past, and who have submitted costly and lengthy applications should face new - post Proposition 50 - standards which may exist for funding sources other than Proposition 50. Such an imposition would create uncertainty not only for those parties in the Proposition 50 situation described, but also for those who in the future, could face similar uncertainty due to other bonds passed after 84 and 1E.

Therefore, it would be equitable, efficient and logical to extend funding for implementation of existing IRWMP Plans by awarding funding to those applicants for implementation projects which have already been evaluated and scored. This would allow for those applicants to move ahead with the implementation of projects, consistent with their existing IRWMP Plans, while the standards and guidelines for IRWMPs are revised to comply with the standards in Proposition 84 and 1E.

The IRWMP process, as some critics have pointed out, is often times expensive in time and money. The State need not make the process additionally uncertain by placing applicants at risk from new unanticipated legislative or initiative funding mechanisms which were not in place at the time well intentioned IRWMP participants initiated their programs, with an expectation that they would be evaluated under the rules that were in place when they submitted their applications.

We wish to thank you for the opportunity to provide this input and hope that the process will lead to a more effective IRWMP Program in the near future.

If you have any questions or require additional information please do not hesitate to contact me.

Sincerely,

John S. Mills